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8 Counsel for Defendant
Peter Townsley

United States District Court

Northern District of California

12 UNITED STATES OF AMERICA } No. CR 10-0428 CRB
13 Plaintiff, }
14 vs. }
15 PETER TOWNSLEY, }
16 Defendant. }
17 STIPULATION AND [PROPOSED]
ORDER TO CONTINUE BOND
HEARING FROM NOVEMBER 19,
2010 TO DECEMBER 17, 2010

19 Peter Townsley, through his counsel of record, and the United States, through
20 its counsel of record, stipulate to the following:

21 1. In an order filed October 20, 2010, this Court (Magistrate Judge Joseph
22 Spero), directed that, in addition to the other conditions of release, \$300,000 of the
23 equity in property in Gonzalez, California be posted to secure the bond by
24 November 19, 2010. See, "Amended Order Re Bond And Terms And Conditions
25 Of Release," Docket No. 10, p. 2, par. 4.

26 2. The Court further ordered the parties to appear on November 19, 2010 at
27 10:30 a.m., "for status regarding the posting of the property." *Id.*, Docket No. 10,
28 p. 3.

1 3. Counsel for Mr. Townsley has provided the government with proof that a
2 lien against the property in Gonzalez, California in the amount of \$300,000 in
3 favor of the Clerk of the Court, Northern District of California was recorded on
4 November 10, 2010, and a current title report. Counsel for Mr. Townsley has also
5 provided the government with documentation of the tax assessed value of the
6 property, which reflects more than sufficient equity to satisfy the bond.

7 4. Prior to approving the bond, the government has requested a current
8 appraisal of the property. Mr. Townsley has contracted for a commercial
9 appraisal to be done on the property, and has provided the government with a
10 copy of the contract for the appraisal.

11 5. The appraisal has not been completed, and it will not be completed by
12 November 19, 2010.

13 6. In light of the posting of the property, and the ongoing good faith efforts
14 to provide the government with the additional information it has requested
15 before approving the bond, the parties jointly request that the Court continue the
16 hearing on the status regarding the posting of the property that is currently
17 scheduled for November 19, 2010, at 10:30 a.m., to December 17, 2010, at 10:30
18 a.m.

20 As counsel for Peter Townsley, I stipulate to paragraphs 1-6, *supra*.

21 | Dated: November 17, 2010 Signed: /s/ William J. Genego

23 As counsel for the United States, I stipulate to paragraphs 1-6, *supra*.

Melinda Haag, United States Attorney

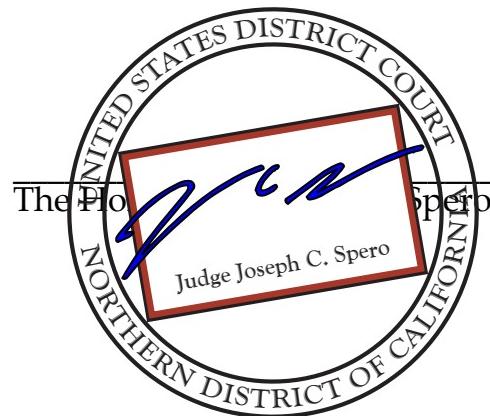
25 Dated: November 17, 2010 By: /s/ Susan E. Badger
Assistant U.S. Attorney

1 The Court approves the stipulation and hereby ORDERS that:

2 The hearing on the status regarding the posting of the property that is
3 currently scheduled for November 19, 2010, at 10:30 a.m., is continued to
4 December 17, 2010, at 10:30 a.m.

5 IT IS SO ORDERED.

6 Dated: 11/18/10



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